

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CIVIL ACTION NO. 3:24-cv-4554-JDA

ELITE HOME CARE, LLC,

Plaintiff,

vs.

PLAINTIFF'S ANSWERS
TO RULE 26.01, D.S.C.

ELITE ANGELS HOMECARE LLC D/B/A
ELITE ANGELS HOME CARE,

Defendant.

Plaintiff answers Local Civil Rule 26.01 Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Answer: None.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

Answer: All of the claims should be tried non-jury to expedite resolution of the matters at issue in this case which include a prayer for equitable relief.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each

publicly owned company in which the party owns ten percent or more of the outstanding shares.

Answer: Elite Home Care, LLC, is not a publicly owned company. There are no parent, subsidiary, partner or affiliate companies of Elite Home Care, LLC. There is no publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of Elite Home Care, LLC. There is no publicly owned company in which Elite Home Care, LLC, owns ten percent or more of the outstanding shares.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Answer: The alleged events giving rise to the plaintiff's claims occurred in Richland County which is located within the Columbia Division of this District. Rule 3.01, DSC.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: No.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Answer: Upon information and belief, the defendant is properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Answer: None known.

McCONOUGHEY LAW FIRM, LLC

By: *s/ Rachel G. McConoughey*
Rachel G. McConoughey
Federal I.D. No.: 12595
100 Whitsett St.
Greenville, SC 29601
Tel.: (843) 425-3006
Fax: (843) 872-0545
Contact@McConougheyLawFirm.com

ATTORNEY FOR THE PLAINTIFF

August 20, 2024
Greenville, South Carolina